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**U.S. Nuclear Regulatory Commission
Washington, D.C. 20555**

Attention: Document Control Desk

**Subject: LaSalle Station Unit 1 and 2
Response to the SALP 12 Report
NRC Docket Nos. 50-373 and 50-374**

**Reference: J. B. Martin letter to Mr. R.E. Querio
dated December 28, 1994, transmitting the
LaSalle County Station SALP 12 Report**

Commonwealth Edison, LaSalle County Station) would like to thank you for meeting with us and presenting the SALP 12 Report on January 17, 1995, as well as affording us the opportunity to provide our views on the SALP results. This letter provides our response to the SALP 12 Report.

We recognize that our ongoing programs for improvement must continue in all functional areas at LaSalle Station, particularly in the areas of Maintenance and Plant Support. We understand the events and issues that contributed to the decline in performance in the areas of Security and Emergency Preparedness and have taken the actions necessary to halt their decline and re-establish an improving trend.

Station reviews in the areas of source term reduction, radiation protection practices, root cause analysis, materiel condition, preventive maintenance weaknesses, and the self assessment process have been conducted. Actions which are in progress or planned are discussed in the attachment to this letter. To address our poor plant response to Site Quality Verification (SQV) issues, SQV has established teamwork meetings with the Radiation Protection, Operations, and Regulatory Assurance Departments. Problem Identification Form (PIF) causal factors are now in a database, and trend charts have been developed and are currently in use.

LaSalle County Station agrees with your assessment of the strengths and weaknesses associated with our overall performance. I can assure you that I am personally involved in the improvement processes and that everyone at LaSalle understands the necessity of accomplishing our mission of improved performance in all areas.

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If there are any questions or comments concerning this letter, please refer them to me at (815) 357-6761, extension 3600.

Respectfully,



R. E. Querio
Site Vice President
LaSalle County Station

cc: J. B. Martin, Regional Administrator, Region III
W. D. Reckley, Project Manager, NRR
P. G. Brochman, Senior Resident Inspector, LaSalle
D. L. Farrar, Nuclear Regulatory Services Manager, NORS
Central file

Attachment
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OPERATIONS:

The overriding focus of Operations is on reinforcing concepts of safe and conservative plant operation, during both normal plant operations and refueling outages. A number of initiatives are underway and planned to aggressively promote and reinforce this philosophy among operators, including seminars to be conducted by the BWR Site Vice Presidents on conservative decision making, with cross sectional attendance by operators from all three of ComEd's BWR plants. Increased involvement of Operations personnel in the Work Control Center(WCC) process will continue to enhance focus on safety and proper work prioritization.

Materiel Condition will be a major station focus for 1995. A Top 5 List has been created, which contains a discrete number of short-term actions, to resolve materiel condition problems identified by operators and other station personnel. In addition to an overall reduction in the level of tolerance for degraded equipment, this effort is aimed at reducing the unnecessary challenges encountered by operators during plant transients. A newly formed Materiel Condition Focus Team reporting to the Operations Manager will monitor and facilitate resolution of these top issues identified by the line organization. A Scram Frequency Reduction Committee has been formed to address the high number of scrams experienced during the last SALP period and to address future issues through contact with the BWR Owner's Group Scram Reduction Committee. Operating Department personnel and SQV staff are working jointly to formulate timely and effective responses to SQV issues.

MAINTENANCE:

Preventive Maintenance - A major effort is underway to improve the Preventive Maintenance program. A Preventive Maintenance Team consisting of maintenance and engineering personnel has been established. The initial goal of the team is to perform a comprehensive review of systems requiring preventive maintenance tasks, especially large pieces of equipment, to provide value added maintenance. The focus is clearly on component problems within plant systems to ensure the proper Engineering and Maintenance focus on equipment reliability. The recently installed Electronic Work Control System (EWCS) allows the System Engineer to more effectively review and trend Maintenance Work History. This information will be used to compare actual performance against existing preventative maintenance practices, so that equipment reliability performance improvements can be made.

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Materiel Condition - Aggressive goals have been established for reducing the Nuclear Work Request (NWR) backlog. In addition, a Radwaste Materiel Condition Improvement Group has been formed and will continue the accelerated efforts of reducing the NWR backlog in this area. System Engineering has recently developed a maintenance work history computer program. The program is being used to trend equipment performance and allow the System Engineers to initiate proper corrective actions to improve equipment reliability. The System Engineers provide Maintenance with recommendations and also report results of the review to upper station management during the System Readiness Review Board presentations.

Work Practices - Planning, scheduling, and execution weaknesses are being addressed through the recently implemented Work Control Initiatives and Maintenance Strategies. Work teams walkdown and review work packages three weeks prior to execution to improve the quality of the planning effort and to reduce work delays. The Work Control Center(WCC) is now monitoring maintenance work milestones.

First Line Supervisors and other managers have recently been involved with establishing and implementing higher standards involving their responsibility for maintaining the training programs associated with good maintenance performance.

Foreign Material - A Foreign Material Exclusion (FME) program manager position has been established. The FME procedure has been revised to identify clear expectations and responsibilities. The FME program manager and first line supervisor(FLS) routinely walk down jobs in progress to evaluate performance. FME guidelines have been developed and provided to all Work Analysts. The pre-job briefing attachment includes a FME discussion section for use by the FLS with the crew.

Engineering:

Materiel Condition - The Top Technical Issues provides long term system action plans. Creation of the Materiel Condition Group combines trending, problem detection, root cause evaluation, and effectiveness review in one functional area. A facilitative task force for materiel condition improvement has been formed to accelerate the pace of accomplishing work and resolving long standing materiel condition problems.

Corrective Actions - The Engineering culture is changing to no longer accept the status quo on issues and to move forward to World Class problem solving. Engineering no longer tolerates overdue items. An aggressive approach to addressing all NRC Generic Letter issues has been taken.

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Plant Support:

Radiation Worker performance - Increased management emphasis on high radworker standards, and an extended NGET course that includes mockup training, have been implemented to correct the inconsistent performance in radiation worker practices. An ongoing effort to upgrade and clarify radiological postings in the plant is in progress. RP Management is interacting with work groups, in informal settings, to identify their concerns and to clarify radworker expectations.

Source Term Reduction - The chemical decontamination of reactor recirculation piping, the L2RO6 RHR chemical decontamination, zinc injection, and the hydrolazing of lines that contribute to general area dose rates are part of our ongoing efforts to reduce and control the high radiation source term that has plagued LaSalle in recent years.

Dose Control/Alara - Additional information is being placed in the plant to assist workers in maintaining dose ALARA. An increased use of cameras and remote monitoring devices has resulted in a substantial dose reduction. The successful chemistry pilot program to reduce worker dose during routine tasks has been extended to the Operating and Security groups. Reduced exposure has been achieved for operators doing rounds and routine surveillances. An ALARA planner has been assigned to the Maintenance Group to assist Maintenance Supervisors in identifying opportunities for dose reduction.

Emergency Preparedness - An ongoing upgrade of the emergency response facilities has resulted in significant improvements. An action plan to correct outstanding SQV identified weaknesses has been initiated with many items completed. A dedicated individual has been assigned to the EP Group with single ownership of the EP training program and tracking of personnel qualifications.

Chemistry - Self-assessment has been augmented by the chemistry department writing departmental field monitoring reports and problem identification forms. They are being tracked and trended in a work assignment database.

Post Accident Sampling System(PASS) priorities have been raised and maintenance has been performed on long standing problems.

Plant water chemistry continues to be maintained below historical values and approaches industry average value during steady state operations. New resins in Radwaste have improved recycle water quality, Make-Up Demineralizer(MUD) resin has been

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replaced to improve effluent quality, and Condensate Polisher(CP) resin replacement is now based on reactor water quality. Seventy condenser tube leaks were plugged during the last refuel outage and the scope of condenser eddy current testing during future refuel outages will be consistent with industry practices

Security - An assessment of Fitness for Duty oversight weaknesses was conducted by the Corporate Fitness for Duty and Site Quality Verification departments. All identified weaknesses have been corrected. The security check - in form has been revised and an independent verification of all background screening information is performed prior to badging an individual. Control of specimen samples has been changed to use a dedicated Airborne Express deposit box and specimen mailers specifically designed for this box. Fitness for Duty lab technicians have been instructed in the chain of custody procedure and the use of the new box and mailers.

LaSalle recognizes there were some significant communication problems between the Station and the Security Force regarding the implementation of the watchman program. The LaSalle Security Administrator's office is now communicating with the Resident NRC Inspector and Region III Safeguards Inspectors on a regular basis.

The revision to LAP 100-26, "Special Investigation Guidelines" ensures both the Shift Engineer and the LaSalle Operations Duty Officer immediately notify the Security Administrator whenever the appearance of tampering or willful misconduct is identified. In addition, the procedure was further revised to include NRC guidelines on investigating events which involve tampering or willful misconduct.